



# INDUSTRY-RECOGNIZED APPRENTICESHIP PROGRAM FREQUENTLY ASKED QUESTIONS

## GENERAL INFORMATION

### Background

The 2017 Executive Order (EO), “Expanding Apprenticeships in America,” contained several sections to help modernize America’s education systems and workforce development programs. Section 4 of the EO, titled “Establishing Industry-Recognized Apprenticeships,” directed the U.S. Department of Labor (DOL) to consider proposing regulations that promote the development of apprenticeship programs by third parties. Section 8 of the EO called for the establishment of a Task Force on Apprenticeship Expansion to identify strategies and proposals to promote apprenticeships, especially in sectors where apprenticeship programs are insufficient. In May 2018, the Task Force on Apprenticeship Expansion submitted a set of recommendations noting that the establishment of Industry-Recognized Apprenticeship Programs (IRAPs) could provide industry organizations and employers more tools to create high-quality apprenticeship programs and opportunities. To address America’s skills gap and to rapidly increase the availability of high-quality apprenticeship programs in sectors where apprenticeship opportunities are not widespread, DOL has issued a Final Rule that establishes a system for advancing the development of high-quality IRAPs.

### What are Industry-Recognized Apprenticeship Programs (IRAPs)?

IRAPs are a new and flexible form of high-quality apprenticeship programs that provides individuals with opportunities to obtain workplace-relevant knowledge and progressively advancing skills. IRAPs include a paid-work and an educational component, and they result in an industry-recognized credential.

An IRAP can be developed by Department-recognized, industry-leading third-party entities such as trade groups; corporations; non-profits; educational institutions; unions; and joint labor-management organizations. The IRAP Final Rule establishes a process for the Department of Labor’s Office of Apprenticeship (OA) Administrator to recognize qualified third-party entities, known as Standards Recognition Entities (SREs), which will, in turn, evaluate and recognize IRAPs consistent with the Department’s standards.

High-quality IRAPs include the following 10 key requirements:

1. **Paid Work.** IRAPs must ensure that apprentices are paid at least the applicable Federal, State, or local minimum wage. The program must provide a written notice to apprentices of what wages they will receive and under what circumstances their wages will increase.
2. **Written Training Plan.** IRAPs must have a written training plan, consistent with its SRE’s requirements and standards. The written training plan, which must be provided to an apprentice prior to beginning an IRAP,



must detail the program's structured work experiences and appropriate related instruction. The training plan must be designed so that apprentices demonstrate competency and earn credential(s), and provide apprentices progressively advancing industry-essential skills.

3. **Written Apprenticeship Agreement.** IRAPs must maintain a written apprenticeship agreement for each apprentice that outlines the terms and conditions of the apprentice's employment and training. The apprenticeship agreement must be consistent with its SRE's requirements.
4. **Specialized Knowledge and Experience.** IRAPs must train apprentices for employment in jobs that require specialized knowledge and experience and involve the performance of complex tasks.
5. **Safety.** IRAPs must provide a working environment for apprentices that adheres to all applicable Federal, State, and local safety laws and regulations and complies with any additional safety requirements of its SRE.
6. **Equal Employment Opportunity.** IRAPs must affirm their adherence to all applicable Federal, State, and local laws pertaining to EEO.
7. **Credit for Prior Knowledge.** IRAPs must provide credit for prior knowledge and experience to apprentices relevant to the instruction of the program.
8. **Mentorship.** IRAPs must provide apprentices structured mentorship opportunities throughout the duration of the apprenticeship that involve ongoing, focused supervision and training by experienced instructors and employees, to ensure apprentices have additional guidance on the progress of their training and their employability.
9. **Industry-Recognized Credentials.** IRAPs must provide apprentices industry-recognized credential(s) during participation in or upon completion of the program.
10. **Disclosure of Costs and Fees.** IRAPs must disclose to apprentices, before they agree to participate in the program, any costs or expenses that will be charged to them (such as costs related to tools or educational materials).

### **Are IRAPs excluded from any sector?**

IRAPs will supplement the successful Registered Apprenticeship Program (RAP). Since the RAP model is already widespread within the construction sector, IRAPs can be developed in any sector except for construction.

### **What is DOL's role and oversight of IRAPs?**

- The Department's quality assurance role allows the Department to evaluate the SRE's ability to fulfill its responsibilities to ensure that their IRAPs continue to satisfy the Department's standards of high-quality apprenticeships.
- The Administrator may discharge recognition, review, suspend, and derecognize SREs.

## **STANDARDS RECOGNITION ENTITIES (SREs)**

### **What types of entities can become SREs?**

The types of entities that can become SREs include, but are not limited to:

- Trade, industry, and employer groups or associations;
- Corporations and other organized entities;
- Educational institutions, such as universities or community colleges;
- State and local government agencies or entities;
- Non-profit organizations;
- Unions;
- Joint labor-management organizations;
- Certification and accreditation bodies or entities for a profession or industry;
- A consortium or partnership of entities such as those above.

**Ineligible to Apply for DOL Recognition:** The U.S. Department of Labor will not recognize SREs that intend to recognize programs that train apprentices to perform construction activities, consisting of: the erecting of buildings and other structures (including additions); heavy construction other than buildings; and alterations, reconstruction, installation, and maintenance and repairs. After receiving recognition, SREs may not recognize programs seeking to train apprentices in these activities.



## What are the criteria to become an SRE?

SREs are trusted workforce development leaders in their industry, either at a local, regional, or national level. An entity is qualified to be recognized as an SRE if it demonstrates the following:

- SREs must have the expertise to set competency-based standards, through a consensus-based process involving industry experts, for the requisite training, structure, and curricula for apprenticeship programs in the industry(ies) or occupational area(s) in which they seek to be an SRE.
- SREs must have the capacity and quality assurance processes and procedures to ensure IRAPs comply with DOL standards for safety, compensation, and quality.
- SREs must have the resources to operate as an SRE for a 5-year period.
- SREs must demonstrate impartiality by disclosing partners who will be engaged in recognition activities, describing their roles, including their relationships with subsidiaries.
  - SREs must be in good standing with the U.S. Federal Government. They cannot be suspended or debarred from doing business with the Federal Government.
  - SREs must have policies, processes, procedures, or structures in place to mitigate any conflicts of interest.
  - SREs must have the appropriate industry and occupational expertise and resources in place to recognize IRAPs in their selected geographical area (Nationwide or limited to a region, State, or local area).

## Where can we find information on the requirements and documents needed to apply to become an SRE?

A list of required documents and other requirements for prospective SREs can be found in the SRE pre-application checklist at: [https://www.apprenticeship.gov/sites/default/files/IRAP\\_SRE\\_Application\\_Checklist.pdf](https://www.apprenticeship.gov/sites/default/files/IRAP_SRE_Application_Checklist.pdf).

## What are the responsibilities of an SRE?

- SREs are responsible for recognizing or rejecting IRAPs in a timely manner.
- SREs must notify the Office of Apprenticeship within 30 days when they have recognized, suspended, or derecognized an IRAP, and include the name and contact information of the program.
- SREs are responsible for providing program and performance data to the Office of Apprenticeship in a timely manner.
- SREs are responsible for only recognizing high-quality IRAPs as set forth by the Department in the IRAP Final Rule.
- SREs must establish policies and procedures for recognizing, and validating compliance of, programs that ensure that SRE decisions are impartial, consistent, and based on objective and merit-based criteria.
- SREs will review programs and validate that they meet the high-quality criteria of an IRAP at initial recognition and on an annual basis.
- SREs must remain in an ongoing quality-control relationship with the IRAPs they have recognized, to include periodic compliance reviews and consideration of apprentices' credential attainment, program completion, retention rates, and earnings.
- SREs must publicly disclose the credential(s) that apprentices will earn during their participation in or upon completion of an IRAP. SREs are responsible for developing policies and procedures for the suspension or derecognition of an IRAP that fails to comply with the SRE's requirements.
- SREs are responsible for developing policies and procedures that require IRAPs' adherence to applicable Federal, State, and local laws pertaining to EEO and reflect comprehensive outreach strategies to reach diverse populations.
- SREs are responsible for having policies and procedures for addressing complaints filed against their IRAPs.
- An SRE must notify the Administrator and must provide all related material information if:
  - It makes any major change that could affect the operations of the program, such as involvement in lawsuits that materially affect the SRE, changes in legal status, or any other change that materially affects the SRE's ability to function in its recognition capacity; or
  - It seeks to recognize apprenticeship programs in additional industries, occupational areas, or geographical areas.



### **What is the process for becoming a DOL recognized SRE?**

Consistent with the IRAP Final Rule, prospective SREs that intend to recognize IRAPs must first apply for recognition by submitting the information requested in the application to the Administrator. Applications should be submitted electronically using the Department's [online application](https://www.apprenticeship.gov) on [www.apprenticeship.gov](https://www.apprenticeship.gov). The application must include all required policies and procedures. Based upon the information submitted, the Administrator will determine whether the applicant is qualified to be recognized as an SRE of IRAPs under the IRAP Final Rule. DOL's Office of Apprenticeship will notify the applicant. An SRE will be recognized for 5 years and must reapply at least 6 months before the date that its current recognition is set to expire if it seeks re-recognition.

### **What evidence can applicants provide to demonstrate that they have the resources to operate as an SRE for a 5-year period?**

Examples of acceptable documentation include but are not limited to: a financial plan and/or description of the costs associated with operating as an SRE; a description of the organization's available funding sources to support SRE operations, including the duration of the funding; and/or a summary of the organization's most recent audit findings supporting the organization's financial solvency. Applicants should also report any significant or resources challenges that occurred over the past 5 years (i.e. bankruptcy, debarments or suspensions) and how the organization will ensure those challenges will not impact its ability to operate as an SRE for a 5-year period.

### **Is there a limit on the number of SREs in a specific geographical area or industry?**

No, there is no limit on the number of SREs in a specific geographic area or industry. The Department believes that having multiple SREs within any given industry or state will help apprenticeships thrive in emerging industries and expand to new and innovative occupational areas. In addition, the presence of multiple SREs will provide prospective IRAPs and employers with an opportunity to assess and determine which SRE is best suited to meet the needs of their programs.

### **How will you know if you aren't approved to become an SRE?**

DOL is suspending the acceptance of new and pending applications to become a Standards Recognition Entity (SRE) until further notice. All SREs that have already been approved by DOL, and all IRAPs that have been recognized by an SRE, should continue to perform their functions as described in the regulation. This suspension in activity only applies to applications by and selection of new SREs.

### **What happens if an SRE no longer meets the requirements? Can an SRE be suspended or derecognized?**

The Administrator may suspend an SRE for 45 calendar days and may initiate review of an SRE if it receives information indicating that: (1) The SRE is not in substantial compliance with this subpart; or (2) The SRE is no longer capable of continuing as an SRE.

The notice will include an explanation of the Office of Apprenticeship's decision, including identified areas in which the SRE is not in substantial compliance or an explanation why the SRE is no longer capable of continuing as an SRE, or both, and necessary remedial actions, and must explain that the Administrator will derecognize the SRE in 45 calendar days unless remedial action is taken or a request for administrative review is made.

If the SRE does not take remedial action or request administrative review of the suspension, the Administrator will derecognize the SRE, notify the SRE in writing, and specify the reasons for the derecognition. The SRE may request administrative review within 45 calendar days of receipt of the notice.

### **What are an SRE's appeal rights?**

An entity that has been denied recognition as an SRE will receive notice of a denial of recognition and may request administrative review within 30 calendar days of receipt of the notice. An SRE will receive notice of suspension or derecognition and may request administrative review within 45 calendar days of receipt of the notice.

Any request for administrative review must comply with the service requirements contained in 29 CFR part 18. The

Administrator will refer any requests for administrative review to the Office of Administrative Law Judges to be addressed. Requests for administrative review should be submitted electronically using the means provided on the Office of Apprenticeship website at [www.apprenticeship.gov](http://www.apprenticeship.gov).

### **What are the reporting requirements for SREs?**

Each year, an SRE must report to the Administrator, in a format prescribed by the Administrator, and make publicly available the following information on each IRAP it recognizes:

1. Up-to-date contact information for each IRAP;
2. The total number of new and continuing apprentices annually training in each IRAP under an apprenticeship agreement;
3. The total number of apprentices who successfully completed the IRAP annually;
4. The annual completion rate for apprentices. Annual completion rate must be calculated by comparing the number of apprentices in a designated apprenticeship cohort who successfully completed the IRAP requirements and attained an industry-recognized credential with the number of apprentices in that cohort who initially began training in the IRAP;
5. The median length of time for IRAP completion;
6. The post-apprenticeship employment retention rate, calculated 6 and 12 months after program completion;
7. The industry-recognized credentials attained by apprentices in an IRAP, and the annual number of such credentials attained;
8. The average earnings of an IRAP's former apprentices, calculated 6 months after IRAP completion;
9. Training cost per apprentice; and
10. Basic demographic information on participants.

### **Will IRAP SREs report through a single system similar to the Registered Apprenticeship Partners Information Data System (RAPIDS)?**

Yes, a new reporting system has been created for IRAP SREs. SREs that have been recognized by the U.S. Department of Labor will receive instructions on how to access the reporting system. The IRAP SRE reporting system is similar to RAPIDS but does not include individual-level data on each apprentice since SREs are only required to provide aggregate-level data for each program they recognize.

### **Can one entity serve as both an SRE and an IRAP Sponsor?**

Yes, SREs can recognize their own programs as IRAPs. The Department is aware that having an SRE recognize its own IRAP could present conflicts of interest. Accordingly, in the final rule, the Department requires that all SREs demonstrate that they can effectively mitigate such conflicts of interest. As part of the SRE application process, the Department requires, at a minimum, that each entity disclose potential conflicts and provide a firewall between SRE and prospective IRAP staff, or assign key tasks to an independent third party. The Department expects that a firewall will prohibit program designers from involvement in recognition decisions and will prohibit SRE personnel who receive complaints from being subject to the same supervisory channels as IRAP managers.

To ensure that SREs are recognizing apprenticeship programs that adhere to the standards of high-quality apprenticeships, the Department requires SREs' recognition, quality control, and suspension and derecognition processes and procedures to be designed and administered so as to treat any nonaffiliated IRAPs equitably. The U.S. Department of Labor intends to enforce such processes, procedures, or structures involving potential conflicts of interest through the quality assurance process outlined in [29 CFR 29.23](#) and the review process outlined in [29 CFR 29.26](#) of the final rule.

### **Can SREs provide the educational component of an IRAP they recognize?**

Yes, SREs are likely to be in the best position to offer services to IRAPs to help them provide high-quality apprenticeships. SREs are required to address conflicts of interest arising from offering services when they apply to become an SRE. This requirement applies to any type of advice, assistance, or consultation for which the SRE seeks compensation.

### **The IRAPs will be accountable to the SREs and the SREs in turn accountable to the Office of Apprenticeship, correct?**

Yes, under [29 CFR 29.22\(a\)\(4\)](#) the SRE is charged with recognizing and maintaining the recognition of IRAPs that meet the requirements in 29 CFR 29.22(a)(4)(i) through (x). These regulations put potential SREs on notice regarding the Department's expectations for high-quality, high-performing programs. If the IRAP does not continue to fulfill its obligations, the SRE will hold the IRAP accountable as appropriate under the framework established by the Department. Additionally, [29 CFR 29.23](#) covers the Department's quality assurance role in holding SREs accountable.

### **Is there a template for applicants to prepare the policies and procedures required for applying to be an SRE?**

The Office of Apprenticeship does not have a template, form, or sample policies and procedures at this time. However, we have developed an [SRE Technical Assistance Guide](#) to help applicants with creating an account, uploading documents, and submitting your application. Additionally, Office of Apprenticeship staff are located across the country and are available to [help](#) if you have any questions.

### **If an SRE is approved to recognize IRAPs in one state or geographic area, and an IRAP sponsor it has recognized has programs located in other geographic areas, will all of the sponsor's programs be recognized?**

No, the SRE can only recognize programs in the geographic area, industry, and/or occupational area for which it is approved by DOL to recognize IRAPs. For example, if an SRE applied for recognition in a certain state, it can only recognize programs in that state. If the SRE recognizes an IRAP sponsor with programs located in several states, the program(s) in the state for which the SRE is approved to recognize IRAPs will be recognized. If the SRE wants to recognize programs in additional states, including nationally, it must update its application and wait for approval from DOL before expansion can begin. SREs are encouraged to carefully consider the geographic areas in which they want to recognize IRAPs before submitting their application.

### **Are there any guidelines or limitations on the fees that SREs can charge?**

No, there are no limitations or guidelines on fees that SREs can charge. However, an SRE must publicly disclose any fees it charges to IRAPs ([29 CFR 29.22\(n\)](#)).

### **Are SRE applications public?**

No, the SRE applications will not be made publicly available; however, some of the information provided in the application will be made public once the SRE is recognized. The confidentiality statement in the SRE application states that: "Under this collection, the name of a potential Standards Recognition Entity will be posted on <https://www.apprenticeship.gov> if the U.S. Department of Labor issues a letter of approval with respect to the entity. While the information collected by this application is generally subject to public disclosure under the Freedom of Information Act (FOIA), Exemption #4 of FOIA (at 5 U.S.C. §552(b)(4)) affords protection to submitters (such as Standards Recognition Entities) that are asked to furnish commercial or financial information to the Federal Government. The Department will keep as private and confidential, and will not disclose, unless required by law, any commercial or financial information provided to the Department under this section that is both customarily and actually treated as private by the SRE or IRAP. The Office of Apprenticeship will provide an applicant notice and an opportunity to object before disclosing information from the applicant. For more information, see [29 CFR part 70](#), 'Production and Disclosure of Information or Materials,' especially [29 CFR § 70.26](#), 'Confidential commercial information.'"

## COMPLAINTS

### Is there a process for complaints against an IRAP?

Yes. An SRE must have policies and procedures for addressing complaints filed by apprentices, prospective apprentices, an apprentice's authorized representative, a personnel certification body, or an employer against each IRAP the SRE recognizes. An SRE must notify the public about the right of an apprentice, a prospective apprentice, the apprentice's authorized representative, a personnel certification body, or an employer, to file a complaint with the SRE against an IRAP the complainant is associated with, and the requirements for filing a complaint.

### Is there a process for complaints against an SRE?

Yes. A complaint arising from an SRE's compliance may be submitted by an apprentice, the apprentice's authorized representative, a personnel certification body, an employer, or an IRAP to the Administrator for review. The complaint must be in writing and must be submitted within 180 calendar days from the complainant's actual or constructive knowledge of the circumstances giving rise to the complaint. It must set forth the specific matter(s) complained of, together with relevant facts and circumstances. The complaints against an SRE are addressed exclusively through the review process outlined in § 29.26. Additionally, nothing precludes a complainant from pursuing any remedy authorized under Federal, State, or local law. An SRE must notify the public about the right to file a complaint against it with the Administrator.

### What happens to IRAPs if their SRE is derecognized?

Following its SRE's derecognition, an IRAP will maintain its status until 1 year after the Administrator's decision derecognizing the IRAP's SRE becomes final, including any appeals. At the end of 1 year, the IRAP will lose its status unless it is recognized by another approved SRE. Once derecognized, the Administrator will update the online list of SREs to reflect the derecognition, and the Administrator will notify the SRE's IRAP(s) of the derecognition.

## IRAP SPONSORS

### What are IRAP Sponsors?

An IRAP Sponsor is the entity responsible for administering the Industry-Recognized Apprenticeship Program. IRAP Sponsors are entities such as trade and industry groups, corporations, non-profit organizations, educational institutions, unions, and joint labor-management organizations.

### How can my company start an IRAP? How can I prepare my organization to start an IRAP?

- Assess your workforce needs, consider how this new flexibility in apprenticeship could offer the right talent development solution, and develop a program.
- Familiarize yourself with the DOL standards for high-quality IRAPs.
- Identify trusted national industry leaders in your industry sector and encourage them to apply for recognition as an SRE.
- Monitor DOL's IRAP website for up-to-date information about recognized SREs.
- Seek recognition from an SRE in your industry or occupational area.
- IRAPs that seek to train apprentices to perform construction activities cannot be recognized by SREs.
- To learn more about how to become an IRAP sponsor:
  - Review the IRAP Sponsor Factsheet
  - Visit [www.apprenticeship.gov](http://www.apprenticeship.gov) to review the IRAP Final Rule and resources to become familiar with IRAPs and the roles and responsibilities of SREs.
  - Sign up for our Apprenticeship Newsletter to receive the latest apprenticeship-related news from USDOL.

### Who is responsible for helping to create IRAPs?

SREs are responsible for setting competency-based standards, for the training, structure, and curricula for apprenticeship programs in the industry(ies) or occupational area(s) for which they have been approved to recognize IRAPs. Once those standards are in place, SRE's are responsible for assisting prospective IRAP sponsors with the development of their programs based on their requirements and standards. Please review the [SRE fact sheet](#) for more information on the roles and responsibilities of SREs.



### **If an SRE is derecognized, what happens to the program?**

Following an SRE's derecognition, an IRAP will maintain its status until 1 year after the Administrator's decision derecognizing the SRE becomes final, including any appeals. At the end of 1 year, the IRAP will lose its status unless it is recognized by another approved SRE. Once the SRE is derecognized, the Administrator will update the online list of SREs to reflect the derecognition, and the Administrator will notify the SRE's IRAP(s) of the derecognition.

### **Are IRAPs required to pay a progressively increasing wage?**

IRAPs must ensure that apprentices are paid at least the applicable federal, state, or local minimum wage and must notify apprentices of circumstances under which wages will increase. Thus, apprentices will have the information necessary to make informed decisions about IRAPs and compare wage offerings of different IRAPs. IRAPs are not required to have a progressive wage structure because different IRAPs will likely vary in duration and will represent a broad spectrum of industries with different market wage trends. Further, a progressive wage structure could limit employer participation in IRAPs, particularly for employers that would offer IRAPs that are limited in duration. This, by extension, could reduce or eliminate choices for individuals seeking apprenticeship opportunities.

## **STATE APPRENTICESHIP AGENCIES**

### **Will U.S. Department of Labor-recognized State Apprenticeship Agencies have responsibility for recognizing the SREs that operate in their states? What is the relationship between State Apprenticeship Agencies and SREs?**

No, State Apprenticeship Agencies (SAAs) are not responsible for recognizing SREs that operate in their states. The IRAP final rule establishes a process for the U.S. Department of Labor's Office of Apprenticeship Administrator to recognize qualified third-party entities, known as SREs, which will, in turn, evaluate and recognize IRAPs consistent with the Department's standards. SAAs and local government agencies or entities are eligible to apply to become an SRE, but with that recognition an SAA has no authority to recognize SREs. The Department notes, however, that IRAP sponsors are required to abide by state and local laws.

### **Can State Apprenticeship Agencies become SREs or IRAP sponsors?**

Yes, SAAs and local government agencies or entities are eligible to apply to become SREs and IRAP sponsors, and have to apply in the same application process as any other entity.

### **Can State Apprenticeship Agencies that are SREs charge and accept fees?**

Yes, subject to any limitations in state law, State Apprenticeship Agencies that are approved as SREs can charge and accept fees for IRAPs, but only in their capacity as an SRE.

### **Are IRAPs replacing State Registered Apprenticeship Programs? If not, what is the advantage of an IRAP versus a State-approved Registered Apprenticeship Program (RAP)?**

No, IRAPs and RAPs will work on parallel tracks with the support of the Department. The Registered Apprenticeship system has produced successful results in many industries for over 80 years and it will continue to do so. The industry-led, market-driven approach outlined in the IRAP final rule will give employers and other stakeholders the additional flexibility necessary to expand the apprenticeship model into new industries where registered programs are less prevalent and to address the diverse workforce needs of different industries and occupations. IRAPs provide a new apprenticeship pathway that lets industry organizations take the lead in identifying high-quality apprenticeship programs and opportunities based on the needs in their industry.

## **IRAPS VERSUS REGISTERED APPRENTICESHIP PROGRAMS**

### **What are the differences between IRAPs and Registered Apprenticeship Programs, and how do we determine which model to use?**

IRAPs are high-quality apprenticeship programs recognized by industry and/or workforce leaders known as SREs. IRAPs were designed to give the additional flexibility necessary to expand the apprenticeship model and to address the diverse workforce needs of different industries and occupations. A RAP is a proven model of apprenticeship that has been validated by the Department of Labor or State Apprenticeship Agency. RAPs are known for their structure,

rigor, and quality and are designed for organizations interested in receiving the DOL or state seal of approval and funding opportunities made available by DOL. The U.S. Department of Labor has created a helpful side-by-side document comparing the two programs at [www.apprenticeship.gov/program-comparison](http://www.apprenticeship.gov/program-comparison).

Based on their needs, each employer can decide whether to register their apprenticeship program with the [U.S. Department of Labor](http://www.dol.gov) or [State Apprenticeship Agency](http://www.stateapprenticeship.gov), or have their program recognized as an IRAP by an SRE.

### **Can we count Industry-Recognized Apprenticeship Programs in Registered Apprenticeship Program metrics?**

No, Registered Apprenticeship Program metrics are specifically for Registered Apprenticeship Programs. There are separate IRAP metrics based on the requirements in the final rule.

### **Are IRAPs required to comply with 29 CFR Part 30 – Equal Employment Opportunity in Apprenticeship, which applies to registered apprenticeship?**

The IRAP final rule places comprehensive EEO responsibilities on both the IRAP sponsor and the SRE, instead of requiring compliance with the provisions of [29 CFR Part 30](http://www.dol.gov), which applies only to Registered Apprenticeship. To be recognized by an SRE as an IRAP, a program must affirm “its adherence to all applicable Federal, State, and local laws pertaining to Equal Employment Opportunity.” [29 CFR 29.22\(i\)](http://www.dol.gov) provides that the SRE must have policies and procedures that both (1) “require IRAPs’ adherence to applicable Federal, State, and local laws pertaining to EEO” and (2) “facilitate such adherence through the SRE’s policies and procedures regarding potential harassment, intimidation, and retaliation (such as the provision of anti-harassment training, and a process for handling EEO and harassment complaints from apprentices).”

## **IRAP FUNDING**

### **Can we continue to use funding already received in our state or existing apprenticeship funding?**

It is important that apprenticeship grantees and contractors pay particular attention to what their funding is allowed to be used for. American Apprenticeship Initiative grants, State Apprenticeship Expansion grants, National Industry and Equity contracts, and Youth grants were designed specifically for Registered Apprenticeship expansion and cannot be used for IRAPs. Scaling Apprenticeship grants and Closing the Skills Gap grants can be used for apprenticeship activities in general, including IRAPs, if such activity is included in the grantee’s Statement of Work.

### **Is there any funding to help offset the costs of being an SRE or IRAP sponsor?**

Yes, there are several sources of potential funding. For example, Workforce Innovation and Opportunity Act (WIOA) funds can be used to offset costs associated with IRAPs. SREs and IRAP sponsors can apply to be added to the state Eligible Training Provider (ETP) list, as is the case with any other prospective training provider. Once on the ETP list, local American Job Centers (AJCs) can refer WIOA participants to IRAP sponsors and use Individual Training Accounts (ITAs) to pay for the training costs of participants who enroll in those IRAPs.

In addition to ITAs, the AJCs can fund portions of the on-the-job training (OJT) component of the IRAP using contracts, based on local policies. WIOA allows for OJT to be paid for with contracts, which can be made with providers that are not on the ETP list. WIOA OJT contracts can be used to fund OJT for one or more eligible participants and can be used to reimburse employers for the extraordinary costs of training at a level of up to 75% of the participants’ wages in certain circumstances. WIOA funds can also be used for supportive services such as transportation, books and supplies, and child care. We strongly encourage potential SREs and IRAP sponsors to partner with the workforce system and vice versa.

Other sources of funding include the following:

- **Trade Adjustment Assistance (TAA).** IRAPs are an allowable type of employer-based training that can be approved for a worker covered by the certification of group eligibility for the TAA program authorized by the Trade Act of 1974, as amended. For a worker to receive approval to enroll in an IRAP funded by TAA, the state must determine that the following six criteria are met in accordance with [20 CFR 617.22](http://www.dol.gov):



- No suitable employment is available for an adversely affected worker;
- The worker would benefit from appropriate training;
- There is a reasonable expectation of employment following completion of training;
- Training is reasonably available to the worker;
- The worker is qualified to undertake and complete such training; and
- Training is suitable for the worker and available at a reasonable cost. The TAA Program can pay for the expenses associated with related instruction (e.g., classroom and distance learning), tools, uniforms, equipment or books for an adversely affected worker's participation in an IRAP.

For more information, please contact the appropriate Regional Trade Coordinator.

- **State Funds.** Many states use statewide governor's reserve funding to support RAPs, and consideration of the use of these funds to support IRAPs is strongly recommended. States have considerable flexibility in designing the uses of their statewide set-aside funds for allowable statewide activities, as noted in WIOA Section 134(a)(3). Such uses could pertain to RAPs, pre-apprenticeships, and IRAPs. Other state-level resources also can be used to support IRAPs, such as tax credits for eligible businesses for each apprentice employed in an IRAP.
- **Discretionary Grants.** The Employment and Training Administration (ETA) issues a variety of discretionary grants that can fund projects that include IRAPs as a training strategy. For instance, H-1B discretionary grant programs can incorporate IRAPs as a training strategy to provide participants with the skills, credentials, and experience necessary to enter middle- and high-skilled jobs across industries and occupations for which employers are using H-1B visas to hire foreign workers. In addition, the Education Stabilization Fund Reimagining Workforce Preparation Grants from the Department of Education can be used for apprenticeship activities in general, including IRAPs, if such activity is included in the grantee's Statement of Work.
- **The GI Bill.** The GI Bill is administered by the Department of Veterans Affairs. GI Bill benefits can be used to help pay for books, supplies, and housing while a veteran is learning a trade or skill through on-the-job training (OJT). The IRAP program must already be approved or the SRE or IRAP sponsor must gain approval for GI Bill benefits. The IRAP sponsor can see the following link for more information and to determine if they meet the requirements for approval (i.e., wage increases, etc.):  
<https://benefits.va.gov/BENEFITS/factsheets/education/OJT.pdf>

## IRAP INDUSTRY-RECOGNIZED CREDENTIALS

### What is the definition of industry-recognized credentials?

Industry-recognized credentials are those that reflect the specific competencies needed for a given industry or occupational area.

### Who determines which credentials are industry-recognized?

To become an SRE, entities must demonstrate that they have the expertise to set competency-based standards, through a consensus-based process involving industry experts, for the requisite training, structure, and curricula for apprenticeship programs in the industry(ies) and occupational areas listed in their SRE application. Once recognized as an industry leader and subject matter expert, the SRE is responsible for determining which credentials are industry-recognized through its own expertise and engagement with industry partners and experts. SREs are responsible for deciding how to structure their programs for imparting industry-recognized credentials. In order to receive recognition to become an SRE, SRE applicants must develop and attach the policies and procedures they plan to use to evaluate and monitor IRAP occupations and credentials and their process to ensure IRAP apprentices achieve those credentials in their SRE application. The Department's requirement that the credential must be industry-recognized is specifically designed to ensure that the credentials are relevant beyond any individual employer. The Department will collect information from each SRE about each credential offered by its IRAPs.

## **Can IRAPs establish their own credentials or do they need to use credentials provided/approved by other agencies or industry associations?**

IRAP sponsors can establish a program using their own credentials or credentials developed by another agency or industry association; however, the SRE is responsible for validating that the credential is industry-recognized.

## **WORKFORCE INNOVATION AND OPPORTUNITY ACT (WIOA SERVICES) FOR IRAPS**

### **How can an IRAP be added to the Eligible Training Provider (ETP) List?**

IRAPs must apply to be added to the state ETP list, as is the case with any other prospective training provider.

### **Are WIOA services covered under IRAPs?**

State and local WDBs can combine IRAPs and WIOA services as they would in the case of any other training provider. Eligible Training Providers (ETPs) receive funding through an Individual Training Account (ITA) for training services, and they must be included on a state ETP list. Under WIOA, a significant amount of autonomy is given to the States and localities to determine criteria for inclusion on ETP lists.

In order to support the related training component of an IRAP using a WIOA Individual Training Account, these programs would still have to apply for status as an ETP on a state ETP list. Once on the ETP list, local American Job Centers (AJCs) can refer WIOA participants to an IRAP and use ITAs to pay for the training costs of a participant who enrolls in those IRAPs that are taking applications (i.e., openings are or will become available).

In addition to ITAs, the local AJC may fund portions of the work-based learning component of the IRAP using contracts, based on local policies. WIOA allows for on-the-job training (OJT), customized training, and incumbent worker training to be paid for with contracts, which can be made with providers that are not on the ETP list. WIOA OJT contracts may be used to fund OJT for one or more eligible participants and may be used to reimburse employers for the extraordinary costs of training at a level of up to 75 percent of the participants' wages in certain circumstances.

WIOA-funded supportive services may also be provided, in accordance with TEGL 19-16, Guidance on Services provided through the Adult and Dislocated Worker Programs under the Workforce Innovation and Opportunity Act (WIOA) and the Wagner-Peyser Act Employment Service (ES), as amended by title III of WIOA, and for Implementation of the WIOA Final Rules, to enable WIOA participants to participate in career and training services.

ETA strongly encourages the WIOA workforce system to coordinate services with IRAPs. To learn more, please review [Training and Employment Act 21-19](#).

## **YOUTH**

### **Is there a minimum age for individuals to participate in an IRAP?**

While the IRAP regulation does not establish a minimum age, the Fair Labor Standards Act sets the [minimum ages and occupations](#) in which youth can be employed in agricultural and nonagricultural employment.

### **Can you explain the relationship between IRAPs and pre-apprenticeship programs?**

Pre-apprenticeships can be used as an on-ramp to IRAPs. Apprenticeship is an efficient and economical solution to give career seekers the skills they need for the jobs of today and the future, and to meet employer needs for skilled talent. Still, many individuals do not have proficiency in basic work-readiness, reading comprehension, or math skills to enter an apprenticeship program. Pre-apprenticeship programs are designed to prepare individuals for Registered Apprenticeship and IRAPs to meet current and future labor market demands while preparing individuals for well-paying careers.

Pre-apprenticeship programs can use a variety of program designs and approaches that can be adapted to meet the needs of diverse populations (e.g., high school students, post-secondary students, out-of-school youth, and dislocated workers). Updated guidance on quality pre-apprenticeships is forthcoming.

## HOW TO LEARN MORE ABOUT IRAPS

- To learn more about IRAPs and SREs:
  - Visit [www.apprenticeship.gov](http://www.apprenticeship.gov) to review the IRAP Final Rule and resources to become familiar with IRAPs and the roles and responsibilities of SREs.
  - Sign up for our [Apprenticeship Newsletter](#) to receive the latest apprenticeship-related news from the USDOL.
- Those interested in becoming an SRE must apply to DOL for recognition.
  - Those interested in becoming an SRE can take the following steps:
    - Step 1: Become familiar with the IRAP model by reviewing the [Final Rule](#), the [IRAP factsheet](#), and [FAQs](#).
    - Step 2: Become familiar with the criteria, roles, and responsibilities of an SRE by reviewing the [SRE Factsheet](#) and the recording of the [IRAP webinar for prospective SREs](#).
    - Step 3: Begin to develop the plans of action, structures, and key partnerships that will form the basis for a successful SRE application.
    - Step 4: Review the [Pre-application checklist](#) to ensure you have all of the required documentation.
    - Step 5: Submit your application to the U.S. Department of Labor for recognition using the online [SRE Application Portal](#). Once you enter the portal, you'll be asked to create an account which will allow you to start, save, and update your application as you wish.
    - Office of Apprenticeship staff are located across the country and are available to [help](#) if you have any questions. We have developed an [SRE Technical Assistance Guide](#) to help you with creating an account, uploading documents, and submitting your application. SRE Application Portal Technical questions can also be submitted via the web at <https://www.apprenticeship.gov/help/irap-support> or emailed to [irap@dol.gov](mailto:irap@dol.gov).
  - DOL is undertaking a review of the IRAP program and as a result suspending the acceptance of new applications to become an SRE and suspending making final determinations for organizations that have already submitted an application to become an SRE until further notice. All SREs that have already been approved by DOL, and all IRAPs that have been recognized by an SRE, should continue to perform their functions as described in the regulation. This suspension in activity only applies to applications by and selection of new SREs.
- Please visit the IRAP website at [www.apprenticeship.gov/IRAP](http://www.apprenticeship.gov/IRAP) for more information on the roles and responsibilities of an SRE and review the pre-application checklist to get started with your application. Once you're ready, you'll find a link to the portal where you can apply online. Office of Apprenticeship staff are located across the country and are available to help if you have any questions.
- To prepare, those interested in developing an IRAP and becoming an IRAP sponsor can:
  - Assess their workforce needs, consider how this new flexibility in apprenticeship could offer the right talent development solution, and develop a program.
  - Familiarize themselves with the DOL standards for high-quality IRAPs.
  - Identify trusted national industry leaders in your industry sector and encourage them to apply for recognition as an SRE.
  - Monitor DOL's [IRAP website](#) for up-to-date information about recognized SREs.
- To prepare, the education and workforce systems can:
  - Consider how IRAPs can strengthen work-based learning models.
  - Continue to learn more and serve as an advocate for increasing the adoption and expansion of apprenticeships.
  - Leverage public-private partnerships to demonstrate their role in creating strong apprenticeship programs.
  - Participate in National Apprenticeship Week by hosting or attending an event to learn more about apprenticeship and the current opportunities that exist.

